

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Civil Action No. 20-cv-6753
SEVERINO JIMENEZ,

Plaintiff,

PLAINTIFF'S ATTORNEYS'
FEES AFFIRMATION

-against-

2050 VALENTINE AVENUE LLC, CHESTNUT
HOLDINGS OF NEW YORK, INC., JONATHAN
WIENER, BEN RIEDER and FIDEL HERERRA,

Defendants.

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Pursuant to the FLSA and NYLL, Plaintiff is entitled to recover attorney's fees concerning Plaintiff's wage and hour claims. Plaintiff's counsel represents Plaintiff on a contingency basis and shall only recover in instances where there is a recovery. Plaintiff's attorney and staff maintain that their lodestar in the case and expenses paid amount to \$39,489.40. Thus, Plaintiff maintains that an award of \$14,999.99 in attorneys' fees and \$1,764.40 in expenses is fair and reasonable. Annexed hereto are Plaintiff's counsel's billable time worked on this matter.

The attorney working on this matter is as follows:

1. I, Matthew P. Madzelan, am an associate at Bell Law Group, PLLC. I received a B.S. in Political Science from Stony Brook University in 2007 and a J.D. from Hofstra University School of Law in 2012. I was admitted to practice in the courts of New York in 2013 and in the Southern District of New York in 2015. The majority of my experience has been in employment litigation, including approximately five years of working on wage and hour and discrimination matters at the law firm of Slater Slater Schulman LLP as well as almost three years working on wage and hour, discrimination and federal employee litigation at Bell Law Group, PLLC. My hourly rate for this matter is \$325.00 per hour.

Plaintiff's Counsel's work in this matter consisted of without limitation: multiple conversations with Plaintiff by phone and in person at the office; background research of the company and prior lawsuits; preparing and filing the Complaint and commencement documents; legal research; preparation and submission of initial disclosures, discovery demands and responses; review of Defendants' responses, employment documents and payroll records; preparation of damages calculations and revisions; preparation for and attending Court conferences; correspondence with the Court; various settlement negotiations with defense counsel; evaluation of claims, damages and issues; preparation and submission of mediation statement; attending mediation; preparation and submission of settlement conference statement; attending settlement conference; and preparation of the motion for settlement approval.

The time spent on such work is set forth in accurate, detailed and contemporaneous records annexed hereto. The hours worked and the rates charged by Plaintiff's counsel was reasonable and necessary in the context of this case, and within the range of accepted rates for firms of our size and attorneys of our experience handling employment matters in the Southern District of New York. Hernandez v. Compass One, LLC, No. 20-cv-7040 (LJL), 2021 U.S. Dist. LEXIS 193461, at *14 (S.D.N.Y. Oct. 6, 2021) ("In this district, courts generally award experienced wage-and-hour attorneys between \$300 and \$400 per hour"); Garcia v. Park, No. 18-CV-10650 (KNF), 2019 U.S. Dist. LEXIS 199910, at *11 (S.D.N.Y. Nov. 15, 2019) ("attorney's fees awards predicated on hourly rates of \$400 are commonly made"); Garcia v. Park, No. 18-CV-10650 (KNF), 2019 U.S. Dist. LEXIS 199910, at *14 (S.D.N.Y. Nov. 15, 2019) ("Courts, in recent FLSA cases in this judicial district, have approved, as reasonable, hourly rates in the range of \$100-\$150 for paralegal services"); Gamero v. Koodo Sushi Corp., 328 F. Supp. 3d 165, 173 (S.D.N.Y. 2018) (\$400 hourly rate approved for counsel with approximately 12 years of experience handling FLSA cases in federal court).

Dated: Syosset, New York
October 11, 2023

Respectfully submitted,
BELL LAW GROUP, PLLC

By: /s/ Matthew Madzelan
Matthew Madzelan, Esq.
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Syosset, New York 11791
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Matthew.M@belllg.com
Attorneys for Plaintiff

**BILLING SUMMARY**

Client: Severino Jimenez
Activity through 10/11/2023

Date	Timekeeper	Client	Matter	Description	Hours	Rate	Amount
10/01/21	Jayne Calderon	Jimenez, Severino	Wage & Hour	New client file prep	2	\$ 100.00	\$ 200.00
10/06/21	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client and attorney- saved notes to file- sent client a follow up email and copied MM	0.7	\$ 100.00	\$ 70.00
10/06/21	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Conference call with client with Jayne to obtain more facts regarding case. Prepared review of file memo and list of to-do's of further documents and info needed.	2.5	\$ 325.00	\$ 812.50
10/07/21	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client- went over the information we need to further assess his claims- called with information on what documents he found- will be sending these to us this week	0.5	\$ 100.00	\$ 50.00
10/08/21	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed tax return client sent, updated review of file with employer's info, researched employer and current case against them by another employee for wage violations. Emailed Jayne to follow up regarding termination letter and further info to obtain.	0.4	\$ 325.00	\$ 130.00
10/08/21	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Phone conference with tax advisor, he will provide tax returns to my email	0.3	\$ 100.00	\$ 30.00
10/08/21	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received tax documents from tax advisor, saved in dropbox and email Matt to let him know	0.2	\$ 100.00	\$ 20.00
10/12/21	Jayne Calderon	Jimenez, Severino	Wage & Hour	Sending follow up email regarding information needed for his case	0.3	\$ 100.00	\$ 30.00
10/13/21	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client regarding details of his case- emailing the attorney update	0.5	\$ 100.00	\$ 50.00
10/15/21	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed termination letter and documents sent by client, planned for next steps	0.2	\$ 325.00	\$ 65.00
03/01/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file and planned for next steps. Reviewed status of other pending case against defendant. Researched minimum wage for maintenance workers. Prepared damages calculations. Researched building owners.	1.1	\$ 325.00	\$ 357.50
03/11/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file and parties, worked on complaint.	0.5	\$ 325.00	\$ 162.50
03/14/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Continued working on complaint.	0.3	\$ 325.00	\$ 97.50
04/12/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file, continued working on complaint.	1.6	\$ 325.00	\$ 520.00
04/18/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Continued working on complaint for unpaid overtime and disability/age discrimination and completed draft.	2.6	\$ 325.00	\$ 845.00
04/23/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Edited and completed second draft of complaint.	1	\$ 325.00	\$ 325.00
07/27/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file and corrected work hours, edited complaint and entered unpaid regular wages causes of action and completed complaint. Prepared proposed summons and researched addresses of defendants for service.	2.2	\$ 325.00	\$ 715.00
08/09/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Created case in ECF and filed complaint. Updated calendar and tasks for service. Updated summonses and prepared civil cover sheet.	1.2	\$ 100.00	\$ 120.00
08/09/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Updated case notes and review of file info.	0.3	\$ 325.00	\$ 97.50
08/11/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Filed CCS and Summons and saved to docket.	0.3	\$ 100.00	\$ 30.00
08/11/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Updated review of file with Judges' info. Reviewed Judge Woods individual rules.	0.5	\$ 325.00	\$ 162.50
09/14/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed order.	0.1	\$ 325.00	\$ 32.50
09/16/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Obtained summons from Pacer and sent summons and complaint to PS to send to process server. Updated case notes.	0.3	\$ 100.00	\$ 30.00
09/20/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed email from PS regarding status of service. Updated calendar with IC info.	0.2	\$ 325.00	\$ 65.00

09/22/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received affidavits of service from process server, emailed Matt and asked if they need filing, saved all in dropbox under new folder	0.4	\$ 100.00	\$ 40.00
09/27/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	MM filed AOS, calendared answer	0.2	\$ 100.00	\$ 20.00
09/27/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed Afd of Serv, combined pdfs and filed on ECF. Updated calendar and case notes.	0.7	\$ 325.00	\$ 227.50
09/28/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Revised filed, dropbox, updated case list	0.2	\$ 100.00	\$ 20.00
10/03/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Responded to PS email for status to provide to client.	0.1	\$ 325.00	\$ 32.50
10/05/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed process service emails regarding efforts to locate Fidel Herrera, reviewed file and provided employment address to process server.	0.2	\$ 325.00	\$ 65.00
10/05/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	phone conference with client regarding address for Defendant Fidel Herrera, email correspondence with Matt and process server	0.5	\$ 100.00	\$ 50.00
10/06/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Took call from DW and responded to defense counsel's email.	0.1	\$ 325.00	\$ 32.50
10/10/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received additional AOS on this case, saved in file, emailed MM about AOS not been filed yet	0.3	\$ 100.00	\$ 30.00
10/11/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed updated docket and defense counsel filings, updated calendar, updated defense counsel and Judge Rochon's information in file and reviewed individual rules of Judge Rochon. Reviewed order for joint letter status and prepared draft of joint letter.	2.4	\$ 325.00	\$ 780.00
10/12/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Edited and updated joint letter with additions from mediation referral order and sent to defense counsel.	0.8	\$ 325.00	\$ 260.00
10/14/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed edits to joint letter, finalized and filed.	0.3	\$ 325.00	\$ 97.50
10/25/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Responded to defense counsel email regarding call dates with mediator. Emailed PS status to provide client.	0.2	\$ 325.00	\$ 65.00
10/26/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Called client to provided update per MM's email	0.2	\$ 100.00	\$ 20.00
10/26/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed emails and updated calendar with mediator call.	0.1	\$ 325.00	\$ 32.50
10/27/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed damages calculations. Researched minimum wage rate for non-resident janitor. Prepared updated damages calculations in preparation for mediation call.	1	\$ 325.00	\$ 325.00
10/31/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file and calculations in prep for call with mediator. Call held with mediator and defense counsel to discuss case, damages and scheduling. Spoke with defense counsel after call regarding mediation date. Emailed PS regarding mediation date to confirm with client and sent various questions for client for info and documents. Updated calendar.	1.6	\$ 325.00	\$ 520.00
10/31/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Email correspondence w MM regarding missing information and potential mediation, try calling client, left voice msg	0.3	\$ 100.00	\$ 30.00
11/01/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Called client; left voice message	0.1	\$ 100.00	\$ 10.00
11/04/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Responded to defense counsel email to schedule mediation.	0.1	\$ 325.00	\$ 32.50
11/08/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Researched financials of defendants and went through dockets, complaints and settlements of numerous lawsuits involving defendants.	2.1	\$ 325.00	\$ 682.50
11/18/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	researched Chestnut Holdings association with employment location, researched mortgages for premises, news articles regarding premises and Chestnut Holdings.	1.3	\$ 325.00	\$ 422.50
12/01/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file and worked on mediation statement.	2	\$ 325.00	\$ 650.00
12/02/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Continued working on mediation statement.	1.3	\$ 325.00	\$ 422.50
12/05/22	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Email client confidentially form to be signed, called him, emailed some docs to MM, sent email re mediation	0.3	\$ 100.00	\$ 30.00
12/05/22	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Responded to JB email regarding status. Reviewed email from mediator. Located confidentiality form, emailed PS to confirm mediation with client and to have form executed, emailed follow up. Spoke with client regarding case and mediation. Sent confidentiality form to mediator. Responded to AB email. Contacted translator's office and obtained translator for mediation. Reviewed research regarding janitorial exemption. Completed draft of mediation statement. Reviewed calculations and planned for initial demand amount.	3.9	\$ 325.00	\$ 1,267.50

12/06/22	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Edited and updated mediation statement and sent to mediator. Responded to mediator email.	0.3	\$ 325.00	\$ 97.50
12/07/22	Jayne Calderon	Jimenez, Severino	Wage & Hour	Calling client re Zoom meeting- getting client started- emailed MM re status of client attendance	0.2	\$ 100.00	\$ 20.00
12/07/22	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Prepared for mediation, reviewed calculations, estimated potential settlement amounts that could resolve claims. Mediation held with parties.	4.1	\$ 325.00	\$ 1,332.50
12/14/22	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed order from Court regarding magistrate and consideration of settlement conference, updated calendar tasks. Updated case notes from mediation, updated and corrected facts info in review of file, prepared salary chart, worked on demand for production of documents.	3.1	\$ 325.00	\$ 1,007.50
12/20/22	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed payroll records and corrected salary information chart. Evaluated whether case falls under 40 hour expected workweek analysis. Prepared draft of amended complaint with minimum wage allegations and corrections of facts. Continued working on discovery demands.	4.3	\$ 325.00	\$ 1,397.50
12/28/22	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed letter from defense counsel and responded to email.	0.1	\$ 325.00	\$ 32.50
01/03/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received initial case management order, reviewed and calendared all deadlines	0.6	\$ 100.00	\$ 60.00
01/10/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed rule 26(f) and planned tasks.	0.1	\$ 325.00	\$ 32.50
01/11/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Responded to defense counsel email regarding proposed discovery order.	0.1	\$ 325.00	\$ 32.50
01/12/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Worked on SDNY proposed discovery plan, reviewed Judge Parker's ICM Order and prepared proposed discovery plan from link in the ICM Order. Planned for discovery needed, reviewed draft demands and updated and completed draft of discovery plan. Edited order and sent to defense counsel. Spoke with defense counsel regarding case and updated settlement offer.	1.8	\$ 325.00	\$ 585.00
01/13/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed various additional case dockets against Chestnut Holdings, type of claims and settlement amounts in furtherance of settlement discussions. Updated case notes from 26(f) conference.	0.9	\$ 325.00	\$ 292.50
01/13/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Spoke with partner regarding case.	0.2	\$ 325.00	\$ 65.00
01/26/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Prepared initial disclosures, revised and updated damages calculations to provide with initial disclosures, reviewed correspondence from client including overtime policy and updated disclosures. Responded to defense counsel email to schedule call. Reviewed Defs initial disclosures and reviewed email of proposed changes to order. Conference call with defense counsel regarding claims. Updated case management order and sent to defense counsel. Made last edits to order, finalized initial disclosures and emailed the documents to defense counsel.	3.3	\$ 325.00	\$ 1,072.50
01/27/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received bounce about Proposed CMP	0.1	\$ 100.00	\$ 10.00
01/30/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Bounce received and saved, updated calendar for IC scheduled	0.1	\$ 100.00	\$ 10.00
02/01/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received bounce, updated the calendar, emailed NL regarding order	0.3	\$ 100.00	\$ 30.00
02/02/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received bounce regarding form to request transcript, saved in dropbox	0.1	\$ 100.00	\$ 10.00
02/02/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed file and proposed order in preparation for conference, conference held, updated.	0.6	\$ 325.00	\$ 195.00
02/03/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Reviewed bounce with order after conference, scheduled all deadlines, sent copy to NL.	0.5	\$ 100.00	\$ 50.00
03/02/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed ICO and judge's order. Updated amended complaint and completed. Continued working on demand for production of documents, added in various requests and completed. Edited and completed first set of interrogatories and emailed discovery requests and amended complaint to defense counsel.	4.4	\$ 325.00	\$ 1,430.00
03/06/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed email from defense counsel regarding joint letter. Prepared letter to client and emailed PS for medical information to obtain from plaintiff and instructions for authorizations. Reviewed defense counsel email, revised joint letter for authorizations section and sent to defense counsel. Reviewed email and filed joint status letter.	1.5	\$ 325.00	\$ 487.50

03/07/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Phone conference w client to obtain medical information for HIPAA release forms, email correspondence with client	0.3	\$ 100.00	\$ 30.00
03/08/23	Priscilla Sandoval	Jimenez, Severino	Wage & Hour	Received bounce regarding CMC, scheduled in calendar, saved bounce	0.3	\$ 100.00	\$ 30.00
03/15/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed discovery demands and complaint. Prepared draft of responses to demand for production of documents. Prepared list of items and questions for additional information and documents needed from client. Worked on responses to interrogatories.	5.9	\$ 325.00	\$ 1,917.50
03/16/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Continued working on interrogatory responses, reviewed SDNY local civil rules for interrogatories, completed draft of responses to interrogatories.	3.2	\$ 325.00	\$ 1,040.00
03/28/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Emailled PS to follow up with client for AZ's.	0.1	\$ 100.00	\$ 10.00
03/31/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Spoke with JC regarding obtaining authorizations from client and sent JC email outlining what is needed. Responded to JC email regarding client wanting to fax authos and spoke with.	0.3	\$ 325.00	\$ 97.50
03/31/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client regarding HIPAA azs for MM case	0.2	\$ 100.00	\$ 20.00
03/31/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client re mailing of docs	0.1	\$ 100.00	\$ 10.00
04/03/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client confirming docs were mailed- let MM know	0.1	\$ 100.00	\$ 10.00
04/06/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Emailled JC to schedule call with client. Spoke with client and JC and obtained various information regarding plaintiff's providers, post termination income, documents, and claims surrounding termination. Updated interrogatory responses.	1.1	\$ 325.00	\$ 357.50
04/06/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client- no ans, left vm	0.1	\$ 100.00	\$ 10.00
04/06/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Translating call for MM and client	0.6	\$ 100.00	\$ 60.00
04/10/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Returning client's call- send msg to MM	0.1	\$ 100.00	\$ 10.00
04/11/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Responded to NL email regarding client call to schedule appointment and emailed JC to call client for additional information.	0.1	\$ 100.00	\$ 10.00
04/11/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client- no ans, left vm	0.1	\$ 100.00	\$ 10.00
04/12/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Edited and completed responses to production of documents, prepared exhibits and sent to defense counsel. Edited and updated interrogatory responses. Prepared draft of letter to client with instructions for authorizations and interrogatory responses. Worked on translation of interrogatories. Translated client letter.	3.2	\$ 325.00	\$ 1,040.00
04/13/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Prepared cover letter to defense counsel and emailed DW instructions for filling out authorization information and sending out discovery responses. Responded to DW email regarding authorization.	0.4	\$ 100.00	\$ 40.00
04/13/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Completed translated interrogatories. Prepared updated Hipaa authorizations with client info. Emailed documents to DW to send to client with instructions.	0.6	\$ 325.00	\$ 195.00
04/20/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Emailed JC with instructions for following up with client regarding interrogatory responses review.	0.2	\$ 325.00	\$ 65.00
04/20/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client- interrogatories	0.4	\$ 100.00	\$ 40.00
04/27/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client regarding forms received in mail	0.1	\$ 100.00	\$ 10.00
05/02/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Updated interrogatories and sent to defense counsel. Spoke with defense counsel twice in settlement negotiations.	1	\$ 325.00	\$ 325.00
05/03/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file and prepared facts and discovery memo for use at discovery conference.	0.6	\$ 325.00	\$ 195.00
05/03/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Discussed case and settlement negotiations with defense counsel. Discovery conference held with Judge Parker.	0.7	\$ 325.00	\$ 227.50
05/03/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Travel to and from SDNY discovery conference from Long Beach, NY.	4.5	\$ 100.00	\$ 450.00
05/10/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed order and updated calendar and tasks.	0.2	\$ 325.00	\$ 65.00
05/12/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed and edited amended complaint and sent to defense counsel for permission to file.	0.4	\$ 325.00	\$ 130.00
05/16/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed email from defense counsel, spoke with DW and provided instructions for entering provider and recipient and sending back. Received and sent authorization to defense counsel. Filed amended complaint.	0.4	\$ 100.00	\$ 40.00

05/24/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Emailed JC to schedule client to come into the office. Reviewed email from defense counsel.	0.2	\$ 325.00	\$ 65.00
05/25/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Meeting with client	1.2	\$ 100.00	\$ 120.00
05/25/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Travel to meet with client.	1.6	\$ 100.00	\$ 160.00
05/25/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed emails and file. Met with client and discussed case, discovery, medical providers and settlement. Updated case notes.	1.7	\$ 325.00	\$ 552.50
05/26/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Investigated numbers provided by Plaintiff for medical providers. Evaluated whether to continue disability claims in light of age discrimination claims and further delay associated with obtaining medical records. Reviewed paystubs as to legal argument that Plaintiff was only paid wages for first forty hours. Worked on responses to Defendants' claimed deficiencies.	2.5	\$ 325.00	\$ 812.50
06/02/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client	0.2	\$ 100.00	\$ 20.00
06/02/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Emailed JC for documents to obtain from client and regarding disability claims. Conference call with client for additional information regarding documents and to discuss removal of disability claims. Emailed JC as to who prepared letter for medical leave.	1.2	\$ 325.00	\$ 390.00
06/06/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed order from the court regarding discovery dispute. Responded to defense counsel email to schedule call.	0.2	\$ 325.00	\$ 65.00
06/07/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Responded to defense counsel email to schedule call and updated calendar tasks for amended complaint and call.	0.6	\$ 325.00	\$ 195.00
06/08/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Continued working on amended complaint, completed and filed.	1	\$ 325.00	\$ 325.00
06/09/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed file in preparation for meet and confer. Meet and confer held. Updated case notes and tasks.	1.4	\$ 325.00	\$ 455.00
06/20/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed joint letter to court requesting discovery extension and responded to defense counsel.	0.2	\$ 325.00	\$ 65.00
06/26/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Spoke with Raphy Sanchez.	0.1	\$ 325.00	\$ 32.50
06/27/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed email from defense counsel.	0.1	\$ 325.00	\$ 32.50
06/28/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Looked up providers addresses from phone numbers given by client and prepared authorizations to defense counsel.	0.8	\$ 325.00	\$ 260.00
06/29/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Received termination letter - saved to client file	0.1	\$ 100.00	\$ 10.00
06/29/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Prepared cover letter for authorizations, spoke with DW with instructions and emailed.	0.2	\$ 100.00	\$ 20.00
07/07/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed discovery responses and emails. Responded to defense counsel email regarding joint letter to court regarding discovery disputes. Researched caselaw regarding cell phone records in FLSA case. Prepared draft of Plaintiff's letter to Court regarding discovery status. Edited completed and filed.	2.4	\$ 325.00	\$ 780.00
07/11/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Updated docket with various items and updated calendar tasks.	0.4	\$ 100.00	\$ 40.00
07/24/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Reviewed various emails regarding discovery, prepared supplemental responses to interrogatories and document demands and sent to defense counsel. Prepared memo for conference.	1.7	\$ 325.00	\$ 552.50
07/24/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Travel to/from Long Beach to SDNY.	4.1	\$ 100.00	\$ 410.00
07/24/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Discussed case with defense counsel. Case management conference held.	1.2	\$ 325.00	\$ 390.00
07/27/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Updated docket in file with various entries.	0.3	\$ 325.00	\$ 97.50
07/27/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Emailed JC to schedule client to come in tomorrow for authorization.	0.2	\$ 325.00	\$ 65.00
07/27/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client re doc for signature	0.1	\$ 100.00	\$ 10.00
07/28/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Researched forms for phone records authorizations and prepared authorization. Emailed JC with phone information to obtain from client.	0.4	\$ 325.00	\$ 130.00
07/31/23	Matthew Madzelan	Jimenez, Severino	Wage & Hour	Emailed JC follow up as to authorization. Reviewed info from client, searched for headquarters of carrier, completed authorization and sent to JC to have client execute. Emailed JC a follow up for status on client signing. Updated authorization and sent to JC to send to client. Spoke with Raphy Sanchez regarding authorization. Emailed JC.	0.9	\$ 325.00	\$ 292.50
07/31/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client re phone carrier and account number	0.1	\$ 100.00	\$ 10.00

07/31/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client- sent info to MM to complete letter and send to client	0.1	\$	100.00	\$	10.00
07/31/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Sending client doc to sign via AdobeSign- call to client to make him aware of document	0.1	\$	100.00	\$	10.00
07/31/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client- will sign forms- let MM know	0.1	\$	100.00	\$	10.00
08/01/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client re signed document	0.1	\$	100.00	\$	10.00
08/01/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Received doc from client- forwarded to MM	0.1	\$	100.00	\$	10.00
08/03/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Updated and completed authorization for cell phone records and sent to defense counsel.	0.3	\$	325.00	\$	97.50
08/21/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed tasks and court orders. Emailed JC instructions to provide client for settlement conference. Spoke with translator service and emailed. Prepared draft of settlement summary form and settlement conference statement. Updated damages calculations. Edited and completed conference documents and submitted.	2.9	\$	325.00	\$	942.50
08/21/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call to client and son re settlement conference- emailed the info and sent update to MM	0.1	\$	100.00	\$	10.00
08/22/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Looked up and planned train schedule for appearance.	0.1	\$	325.00	\$	32.50
08/23/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed file, mediation statement, calculations and prepared memo for settlement conference.	0.9	\$	325.00	\$	292.50
08/23/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Travel to/from Long Beach to SDNY.	3.3	\$	100.00	\$	330.00
08/23/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Settlement conference held.	2.6	\$	325.00	\$	845.00
09/06/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed settlement agreement. Planned next steps and prepared draft of agreement in Spanish. Worked on Cheeks motion for settlement approval and completed draft.	4.9	\$	325.00	\$	1,592.50
09/14/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Sending msg to MM for update on client case	0.1	\$	100.00	\$	10.00
09/15/23	Jayne Calderon	Jimenez, Severino	Wage & Hour	Call with client regarding case status- sent follow up email to MM	0.1	\$	100.00	\$	10.00
09/19/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Spoke with NL regarding expenses and billing list for Cheeks submission.	0.1	\$	100.00	\$	10.00
09/20/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Prepared settlement calculations for apportionment, updated Spanish version of agreement. Emailed agreements to JC to provide to client with instructions.	0.5	\$	325.00	\$	162.50
10/02/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Updated settlement breakdown and edited and updated Cheeks motion for settlement approval.	0.8	\$	325.00	\$	260.00
10/06/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Researched caselaw for general releases in FLSA actions involving discrimination claims. Updated Cheeks motion and emailed defense counsel. Worked on updated draft of joint letter. Spoke with defense counsel regarding timeline and next steps for submission of agreement and Cheeks motion.	1	\$	325.00	\$	325.00
10/11/23	Matthew Madzellan	Jimenez, Severino	Wage & Hour	Reviewed signed agreement and edits to Cheeks motion for settlement approval. Updated and completed Cheeks motion. Prepared attorneys' fees affirmation and edited and updated billing spreadsheet.	1.6	\$	325.00	\$	520.00
08/15/22	EXPENSE	Jimenez, Severino	Wage & Hour	Court Filing Fee			\$	402.00	
09/21/22	EXPENSE	Jimenez, Severino	Wage & Hour	Process Service Upon All Defendants			\$	631.40	
12/07/22	EXPENSE	Jimenez, Severino	Wage & Hour	Translation Services Mediation			\$	356.00	
09/14/23	EXPENSE	Jimenez, Severino	Wage & Hour	Translation Services Settlement Conference			\$	375.00	

TOTAL LABOR	137.4		\$	37,725.00
TOTAL EXPENSES			\$	1,764.40
GRAND TOTAL				\$ 39,489.40



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		Job Date:	12/7/2022
Item	DESCRIPTION	Amount	
Language -	Spanish	356.00	
Held at -	Remote Proceeding		
Requested by	Bell Law Group / By: Matthew Madzelan, Esq.		
In the matter entitled -	Jimenez, Severino v. 2050 Valentine Avenue, LLC		
Witness	Severino Jimenez		
Billing Data -	-----		
	10:00 AM to 1:30 PM Four (4) Hours @ \$89.00 Per Hour		
Terms: NET 30 DAYS		Total	\$356.00

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Bill To :		Invoice No. :	23/134450
Bell Law Group 116 Jackson Avenue Syosset, NY 11791 Attn.: Accounts Payable		Invoice Date :	9/11/2023
		Job Date:	8/23/2023
Item	DESCRIPTION	Amount	
Language -	NY State Court Certified Spanish	375.00	
Held at -	US District Court - SDNY 500 Pearl Street, Courtroom 17-D New York, NY 10007		
Requested by	Bell Law Group / By: Matthew Madzelen, Esq.		
In the matter entitled -	Jimenez v. 2050 Valentine Avenue LLC, et al		
Witness	Severino Jimenez, Esq.		
File No. -	1:22-cv-06753-JLR-KHP		
Billing Data -	10:00 AM to 12:25 PM Three (3) Hour Minimum @ \$125.00 Per Hour		
Terms: NET 30 DAYS		Total	\$375.00

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Invoice Date	9/11/2023
Total	\$375.00
Tax ID No.: 20-5015354	